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August 26, 2004

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**BY ELECTRONIC AND FIRST CLASS MAIL**

Mary L. Cottrell  
Secretary  
Department of Telecommunications & Energy  
Commonwealth of Massachusetts  
One South Station, 2nd Floor  
Boston, Massachusetts 02110

**Re: D.P.U./D.T.E. 97-88/97-18 - Implement FCC Compliant Payphone Services Rates**

Dear Ms. Cottrell:

The New England Public Communications Council, Inc. ("NEPCC") respectfully submits this letter in light of the recent response filed by Verizon Massachusetts ("Verizon MA") to newly submitted comments by the Attorney General in this proceeding addressing the matter of Verizon MA's "recovery" of lost revenues due to the implementation of FCC compliant payphone access rates directed by the Department.

The NEPCC takes no position on Verizon MA's entitlement to any such recovery of lost revenues, the bulk of which is due to the benefits of lower rates now to be afforded to *Verizon-MA's very own payphone operations*. However, the NEPCC strongly objects to and opposes any delay in the implementation of the Department-ordered rates, while the scope and means of implementing such recovery is debated. As it is NEPCC members will apparently be paying a portion of this recovery themselves in their residential phone rates.

This proceeding was initiated in December of 1997; its 7<sup>th</sup> anniversary is soon approaching. In June of this year the Department decided that payphone providers are entitled to adjusted rates. That entitlement, which the NEPCC respectfully contends started in April of 1997, must not be further delayed beyond the compliance filing effective date of October 6, 2004 to figure out how Verizon MA should recover lost revenues. As noted above, most of the revenue shortfall is derived from reduced rates that would be "paid" by Verizon MA's own payphone operations.



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Respectfully submitted ,

A handwritten signature in black ink, appearing to read 'Paul C. Besozzi', with a long horizontal line extending from the end of the signature.

Paul C. Besozzi  
Counsel to the New England  
Public Communications Council, Inc.

cc: 97-18 Service List